

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

JOE ALEXANDER

Plaintiff,

v.

Case No. 3:19-cv-00688-JAG

DIET MADISON AVENUE, *et al.*,

Defendants.

**MOTION OF NON-PARTIES THE MARTIN AGENCY AND THE INTERPUBLIC  
GROUP OF COMPANIES, INC. FOR LEAVE TO INTERVENE, TO SEAL  
CONFIDENTIAL INFORMATION AND FOR PROTECTIVE ORDER**

Proposed Intervenors, The Interpublic Group of Companies, Inc. (“IPG”) and The Martin Agency (“Martin”) (collectively, “Proposed Intervenors”), by counsel, pursuant to Rules 24 and 26 of the Federal Rules of Civil Procedure, and to Rule 5 of the Local Civil Rules for the United States District Court for the Eastern District of Virginia, hereby move for leave to intervene for the limited purpose of seeking the entry of an order sealing portions of the Complaint filed in this action, and of a protective order requiring that future filings redact information that would expose the identity or identities of Plaintiff’s accuser(s). The grounds for Proposed Intervenors’ motion are set forth more fully in the supporting memorandum filed contemporaneously herewith.

Pursuant to Local Civil Rule 5(C), a proposed order granting Proposed Intervenors’ motion to partially seal the Complaint is attached hereto.

WHEREFORE, Proposed Intervenors respectfully request that their motion be granted; that they be allowed to intervene in this action for a limited purpose; that the Court enter an order partially sealing the Complaint; that the Court enter a protective order restricting the public disclosure of information identifying Plaintiff’s accuser(s); and that Proposed Intervenors be granted any additional relief the Court deems fair and just.

Date: October 8, 2019.

Respectfully submitted,

THE INTERPUBLIC GROUP OF  
COMPANIES, INC.  
and  
THE MARTIN AGENCY

By Counsel

/s/

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\* *pro hac vice* admission pending

*Counsel for Proposed Intervenors  
The Interpublic Group of Companies, Inc.  
and The Martin Agency*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of October, 2019, I will electronically file a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the registered participants as identified on the NEF to receive electronic service, including:

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/s/

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